

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
WILSON DIVISION

IN RE:
HEAD GRADING CO., INC.

CASE NO.:
05-02729-8-JRL

RESPONSE TO MOTION TO LIFT AUTOMATIC STAY

NOW COMES Stephen L. Beaman, Chapter 7 Trustee herein and hereby responds to the Motion to Lift Automatic Stay filed on behalf of Ruby Lee Head and hereby states as follows:

1. It is disputed that Ruby Lee Head has a properly perfected lien on the property listed in the Motion to Lift Automatic Stay.
2. The Trustee intends to file an adversary proceeding complaint against Ruby Lee Head to avoid her lien.

WHEREFORE, the Trustee hereby requests a hearing on this matter.

This the 4th day of November, 2005.

Law Office of Stephen L. Beaman, P.A.

S/Stephen L. Beaman
Stephen L. Beaman, N.C. State Bar No. 6021
P.O. Box 1907, Wilson, NC 27894-1907
Phone (252) 237-9020 Fax (252) 243-5174
email sbeaman@beamanlaw.com

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Response was served on the persons named below, on this date by mailing a copy of the said document to them at the addresses shown below, by depositing the same in a postpaid, properly addressed wrapper in a Post Office or other official depository under the exclusive care and custody of the U.S. Postal Service.

This 4th day of November, 2005.

Law Office of Stephen L. Beaman, P.A.

S/Stephen L. Beaman

Stephen L. Beaman, N.C. State Bar No. 6021
P.O. Box 1907, Wilson, NC 27894-1907
Phone (252) 237-9020 Fax (252) 243-5174
email sbeaman@beamanlaw.com

SERVED ON:

John G. Rhyne
P. O. Box 7479
Wilson, NC 27895-7479

Head Grading Co., Inc.
2124 B Airport Road
Fremont, NC 27830

Michael P. Peavey
P. O. Box 1115
Wilson, NC 27894-1115

Bankruptcy Administrator
P. O. Box 3758
Wilson, NC 27894-3758